

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

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**IN RE: LIQUID ALUMINUM**

**SULFATE ANTITRUST LITIGATION**

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: MDL No. 16-MD-2687 (JLL) (JAD)  
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**STIPULATION**

WHEREAS, the Indirect Purchaser Plaintiffs ("IPPs") have entered into proposed settlements with the following defendants in the above-captioned matter: (1) Chemtrade Logistics Income Fund, General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical, LLC, GenTek Inc., Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US LLC, Chemtrade Solutions, LLC, Alex Avraamides, Frank Reichl, Amita Gupta, Vincent Opalewski, Matthew LeBaron, and Scott Wolff<sup>1</sup> (the "IPP/Chemtrade Settlement") (ECF 1277-1), (2) Southern Ionics Incorporated and Milton Sundbeck (the "IPP/Southern Ionics Settlement") (ECF 1277-2), and (3) Kemira Chemicals, Inc. (the "IPP/Kemira Settlement") (ECF 1277-3), and have moved for preliminary approval thereof (Docket Entry 1276).

IT IS HEREBY STIPULATED AND AGREED, among the IPPs and the Direct Action Plaintiffs listed below (the "Ballard DAPs")<sup>2</sup>, by and through their undersigned counsel, that, if

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<sup>1</sup> These fifteen defendants are collectively referenced below as the "Chemtrade Settling Parties".

<sup>2</sup> These Direct Action Plaintiffs are the Mayor and City Council of Baltimore, the City of Richmond, Washington Suburban Sanitary Commission, Fairfax County Water Authority, Appomattox River Water Authority, County of Chesterfield, County of Henrico, City of Lynchburg, City of Newport News, City of Norfolk, Rivanna Water & Sewer Authority, South

and to the extent any of the Ballard DAPs is a member of the Indirect Purchaser Settlement Class in connection with the IPP/Chemtrade Settlement, the IPP/Southern Ionics Settlement, and/or the IPP/Kemira Settlement, each such Ballard DAP shall be excluded therefrom.

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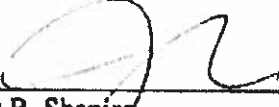
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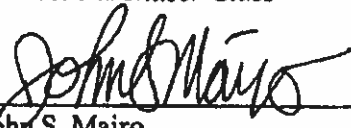
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Central Wastewater Authority, City of Springfield, Commissioners of Public Works of the City of Charleston (d/b/a Charleston Water System), Grand Strand Water & Sewer Authority, City of Spartanburg, City of Winston-Salem, the South Carolina Public Service Authority (d/b/a Santee Cooper), and the City of Greenville.


and to the extent any of the Ballard DAPs is a member of the Indirect Purchaser Settlement Class in connection with the IPP/Chemtrade Settlement, the IPP/Southern Ionics Settlement, and/or the IPP/Kemira Settlement, each such Ballard DAP shall be excluded therefrom.

  
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**IT IS SO ORDERED.**

Dated June 6-19



UNITED STATES DISTRICT JUDGE